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AUGUST 29, 2015

**Proposed Changes to the LPFM service requested in Proceeding RM-11753 BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION (FCC), REPECTFULLY:**

- **Power**

We need to be a class of service that is viable. It is very hard to get the signal on clock radios inside homes & businesses even if the business or house is just a Mile or so away from the transmission site. Good radio practice should be as long as it doesn't cause any interference to another station, there should be no harm and this power increase would allow people to hear us in our demographic because if they can't pick us up without static then are we really doing a good service? (This also goes to support if they signal is so weak that they have struggles getting us how can we ask for support?) The Frequency should be protected on the basis of local service as much as possible with primary status. With new technologies and Transmission methods coming on line, protection of local radio should be a priority. With good engineering practice, this request should be granted immediately.

- **Enhanced Underwriting**

This issue it is a tough one. Enhanced underwriting rules are very confusing and just easy to confuse what is and what isn't legal in this area since layman have such a hard time interpreting these rules. It is hard to explain to supporters and business people. Every station must do its best to follow the rules. One thing that makes no sense is I can say the phone number is but I can't say call and then the phone number. Our station would not be interested in traditional commercials since it is our belief that the advertising on commercial radio is what makes that format unpleasant to listen to. However, LPFM operators appreciate it if underwriting rules could be clarified and eased a bit such as allowing call to actions. When I tell people "call to action cannot be done" this action is the item that makes no sense. I really don't think letting us say what we want as far as sponsors would constitute the station being commercial it still has to be run by a NON-Profit.

- **Localism**

The only way to keep LPFM Local is to make sure ownership is kept local by only permitting a "LOCALIZED" NON PROFIT GROUP to own the station. The drive to limit ownership to a "Non Profit Corporation" will keep the Station open to serving the public whereas opening ownership up to individuals will encourage the same excesses we saw driving the formation of LPFM. Keeping the Service on a Non Profit basis will allow growth also but not at the expense of LOCALISM.

- **Transfer of Ownership**

As with life and time, all things are subject to change, It is a shame that the founding Corporation cannot sell at a profit a station that the Non Profit group has put in years of hard work in to just be basically given to the another Non-Profit Corporation without meaningful compensation. These stations have been built from ground up from a dedicated by a Non-Profit group and the current Non-Profit should be able to be compensated from all the work and dedication. I believe it still should be run under non-Profit entities to ensure true localism.


- **Call signs**

We would also support "-LP" call letters only being necessary when the call sign is not unique. The "-LP" only adds unnecessary confusion for our listeners and underwriters. Honestly, saying "-LP" isn't all that catchy either and makes it difficult to brand and market.

- **Conclusion**

I support RM-11753. More power doesn't harm anyone as long as no interference is caused and it will better serve the public as this is what the law intended. If they can't hear the signal it serves no purpose. Changing the rules as far as Enhanced Underwriting is imperative to the viability of many non-Profit stations. Enhanced Underwriting shouldn't make them considered a for profit station and as a lower power counterpart we in no way should competition to commercial radio since their respective service area is a smaller contained area. The protection of existing low power stations are a must so that we can be assured that Local Radio will thrive to continue to serve our respective communities.

Respectfully,



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